

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
DOCKET NO. CRIMINAL 24-72

UNITED STATES OF AMERICA,)	
)	
PLAINTIFF,)	DEFENDANT JERRY HAL SALITERMAN
)	THIRD
)	STATEMENT OF FACTS IN SUPPORT OF
vs.)	EXCLUSION OF SPEEDY TRIAL TIME
)	
JERRY HAL SALITERMAN,)	
)	
DEFENDANT.)	

* * *

This matter is before the Court on the Amended Arraignment Notice and Scheduling Order (Docket 26).

I, Jerry Hal Saliterman, now personally make this Statement of Facts in Support of Exclusion of Speedy Trial time. I have read and understand Docket 26, the Court's Amended Arraignment Notice and Scheduling Order setting forth various appearance dates in my case. Those dates are: Government disclosure due by 22 July 2024, Defendant disclosure due by 29 July 2024, Motions filed by 5 August 2024, Responses to Motions due by 19 August 2024, Notice of Intent to Call Witnesses due by 19 August 2024, Response to Notice to Call Witnesses due by 22 August 2024, Arraignment set for 26, August 2024, Motions Hearing set for 26 August 2024, Trial materials and Jury Instructions submitted by 28 August 2024, Responses to trial-related motions due by 9 September 2024, Status Conference set for 9 September 2024, Trial set for 9 September 2024.

I specifically agree to waive my statutory and constitutional speedy trial rights with regard to all these dates in order to permit my counsel adequate time to prepare for trial. I make these waivers after full consultation with my counsel and on his advice to do so. I have not been coerced

by anyone to waive these rights and do so of my own free will with full understanding of my rights. I request that the Court exclude any delay resulting from any continuance granted of the dates in Docket 26 from the computation of the speedy trial time because “the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial” pursuant to 18 U.S.C. § 3161(h)(7)(A), for the following reasons that my counsel has discussed with me and with which I agree.

The Grand Jury charged me on 13 March 2024 with Count One, Theft of Major Art Work, Title 18, United States Code, Section 668 and Count Two, Witness Tampering, Title 18, United States Code, Section 1512(b)(3), committed over a thirteen-year period from 2005 to 2018 (Count 1); and 2023 to 2024 (Count 2). Indictment at 1-2 (Docket 1).

The Government’s investigation over this fourteen-year period consists of 35,000 pages of material. There is no possibility that my counsel could digest and analyze this voluminous discovery so as to provide me with competent representation with the date settings in Docket 26. In addition, review of this 35,000 pages of discovery material will undoubtedly generate investigative measures that must be taken to prepare for trial.

I am aware that a reasonable continuance of these dates could delay my trial well in 2025 and I willingly agree to such a continuance.

Dated: 22 July 2024

s/Jerry Hal Saliterman

Jerry Hal Saliterman

s/John C. Brink
Counsel for Jerry Hal Saliterman

Signed original of this document available from counsel on request.